



Los Angeles Regional Water Quality Control Board

February 21, 2013

Mr. Jon Armstrong
ARCO/BP West Coast Products LLC
501 Westlake Park Blvd., WL1-28.160D
Houston, TX 77079

Sent by e-mail
Jon.Armstrong@bp.com

DIRECTIVE TO TAKE CORRECTIVE ACTION IN RESPONSE TO UNAUTHORIZED UNDERGROUND STORAGE TANK RELEASE – HEALTH AND SAFETY CODE SECTION 25296.10 AND TITLE 23, CHAPTER 16, CALIFORNIA CODE OF REGULATIONS, SECTIONS 2720-2727

ARCO #1289

4861 EAST FIRESTONE BOULEVARD, SOUTH GATE (CASE NO. I-12054) (Priority A1)

Dear Mr. Armstrong:

Pursuant to Health and Safety Code section 25296.10, you are required to take corrective action (i.e. Preliminary Site Assessment, Soil and Groundwater Investigation, Corrective Action Plan Implementation, and Verification Monitoring) to ensure protection of human health, safety and the environment. Corrective action requirements are set forth in California Code of Regulations (CCR), title 23, section 2720 through 2727.

We have reviewed your "Shallow Soil Excavation Work Plan" dated December 21, 2012, and "Shallow Soil Excavation Work Plan Addendum" dated January 11, 2013, prepared by your consultant ARCADIS. Your workplans contain a proposal to excavate between 5 to 6 feet below ground surface (bgs) and remove approximately 70 cubic yards of contaminated soil from the three former dispenser islands. Four soil samples to be collected from depth greater than 4 feet bgs from the side walls of excavation and one duplicate sample will be submitted for laboratory analysis for TPHg by USEPA Method 8015B. The excavations will be backfilled with controlled density fill (CDF) and compacted. A report detailing the excavation and confirmation sampling along with the results of the "Soil and Soil Vapor Assessment Work Plan" dated September 8, 2012, and approved by the Los Angeles Regional Water Quality Control Board on September 26, 2012, will be submitted 8 weeks after the field work is completed. These workplans were developed to pursue site closure in accordance with the criteria described in the Low-Threat Underground Storage Tank Closure Policy (State Water Resources Control Board (2012). Based on our review, we concur with your workplan as proposed, provided the following conditions are met:

1. All permits must be obtained from the appropriate agencies prior to the start of work.
2. All soil samples collected must be field screened for petroleum hydrocarbons using either a Photo Ionization Detector or a Flame Ionization Detector.

3. Soil samples must be analyzed by Cal-LUFT GC/FID or Cal-LUFT GC/MS Method for total petroleum hydrocarbons as gasoline (TPH_G); and by EPA Method 8260B for BTEX, Naphthalene and fuel oxygenate compounds including methyl tertiary butyl ether (MTBE), di-isopropyl ether (DIPE), ethyl tertiary butyl ether (ETBE), tertiary amyl methyl ether (TAME), and tertiary butyl alcohol (TBA). Ethanol is also required and shall be analyzed by either method above. The analytical detection limits must conform to the Regional Board General Laboratory Testing Requirements (9/06) (http://www.waterboards.ca.gov/losangeles/publications_forms/forms/ust/lab_forms/labreq9-06.pdf). All respective analytical methods must be certified by the California Environmental Laboratory Accreditation Program (ELAP). All analytical data must be reported by a California-certified laboratory.
4. Pursuant to State Water Resources Control Board Resolution No. 92-49, under Water Code Section 13304, all fieldwork related to subsurface investigation including well installation must be conducted by, or under the direct responsible supervision of, a licensed California Professional Geologist (PG) or Civil Engineer (PE). All technical documents submitted to this Regional Board must be reviewed and signed and/or stamped by a licensed California PG or PE with at least five years subsurface hydrogeologic experience. A California-licensed land surveyor must survey all monitoring wells. The survey report, signed by the licensee, shall be included in the assessment report.
5. You are required to notify us at least seven working days prior to field work so that we can schedule a member of our staff to be present.
6. All reports submitted to this office must conform to the "Guidelines for Report Submittals - Revised June 1993" published by the Los Angeles County Department of Public Works.

You are required to submit a technical report detailing the progress of this phase of work to our office by **May 15, 2013**.

If you have any questions, please contact Mr. Nhan Bao at (213) 576-6703 or nbao@waterboards.ca.gov.

Sincerely,



Gregg Kwey, P.E.
Senior Water Resource Control Engineer

Cc: Kathy Jundt, SWRCB, Underground Storage Tank Cleanup Fund
Tim Smith, Los Angeles County Department of Public Works, Environmental
Program Division
Lita Freeman, ARCADIS